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*Attorneys for Plaintiff***UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA****TAMAR ESTANBOULIAN,
Individually And On Behalf Of
All Others Similarly Situated,****Plaintiff,****v.****TOYS ‘R’ US-DELAWARE,
INC.,****Defendant.****Case No.: 13-CV-00586-JAH-BLM****CLASS ACTION****JOINT MOTION TO DISMISS
PLAINTIFF’S CLASS CLAIMS
IN THEIR ENTIRETY
WITHOUT PREJUDICE****Hon. John A. Houston**

On May 30, 2013, the Court granted the Parties’ Joint Motion to Dismiss the Individual Claims of Plaintiff Tamar Estanbouljian with prejudice [Dkt. No. 15].

Defendant TOYS ‘R’ US-Delaware, Inc. (“Defendant”), by and through their

undersigned attorneys, and Plaintiff Tamar Estanboulion ("Plaintiff"), by and through her undersigned attorneys, stipulate and jointly move as follows:

IT IS HEREBY STIPULATED AND AGREED that Plaintiff will, and hereby does, dismiss with without prejudice the class claims brought in the above-entitled action, filed in the U.S.D.C., Southern District of California, Case No. 13-CV-00586-JAH-BLM, resulting in this case being dismissed in its entirety.

IT IS FURTHER STIPULATED AND AGREED that Defendant's Motion to Dismiss under F.R.C.P. 12(b)(6) is hereby withdrawn.

IT IS FURTHER STIPULATED AND AGREED that each party shall bear its/her own attorney's fees and costs with respect to this dismissal.

Dated: May 31, 2013

Respectfully submitted,

KAZEROUNI LAW GROUP, APC

BY: /s/ ABBAS KAZEROUNIAN
ABBAS KAZEROUNIAN, ESQ.
ATTORNEYS FOR PLAINTIFF

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BY: /s/ KATHYLEEN A. O'BRIEN
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Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to Kathleen A. O'Brien, counsel for Defendant, and that I have obtained Kathleen A. O'Brien's authorization to affix her electronic signature to this document.

KAZEROUNI LAW GROUP, APC

Dated: May 31, 2013 By: /s/ Abbas Kazerounian, Esq.